

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INTELLECTUAL VENTURES I LLC and)
INTELLECTUAL VENTURES II LLC,)
Plaintiffs,)
v.) C.A. No. 10-1066 (SLR-MPT)
HYNIX SEMICONDUCTOR INC., HYNIX)
SEMICONDUCTOR AMERICA INC.,)
ELPIDA MEMORY, INC. and ELIPDA)
MEMORY (USA) INC.,)
Defendants.)

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITHOUT PREJUDICE

Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (collectively, “IV”), and Defendants Elpida Memory, Inc. and Elpida Memory (USA) Inc. (collectively, “Elpida”), having settled their dispute in this action by entering into a patent license agreement, hereby agree to dismiss without prejudice all claims asserted between IV and Elpida in this action. Each side shall bear its own costs, expenses and attorneys’ fees.

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SO ORDERED this _____ day of _____, 2012.

The Honorable Sue L. Robinson